

FTTS DATA ENTRY FORM

INSPECTION

Inspection Date 9/28/99
 Inspector Number 18543
 Inspection Seq. 1
 Legislation Ind. T Investigation Type WPF
 Inspection Status C
 Region/State 03
 Inspector Name RAC
 Reason for Inspection NSP Referral _____
 File Number 99-005W
 Date Rpt. Rec. 11/8/99 Warrant Required _____
 Number of Samples 0
 CBI: y n ✓ Number School _____
 School Type _____
 Facility Function US
 EPA Established _____
 Number of Audits _____
 Prod. Reg. # _____

REMARKS:

NO ~~current~~ PCB Transformers
active

Site Name: ASHLAND CHEMICAL Co.
 Address: BIG SANDY RIVER ROAD
 City: KENOVA State: WV
 Zip Code: 25530

Site Duns No.: _____
 Site SIC Codes No.: 28

Parent Co. Name: ASHLAND CHEMICAL Co.
 Parent Co. Add.: P.O. Box 391
 Parent Co. City: ASHLAND
 State: KY Zip Code: 41114

Identifier : _____
 Rep_Comp : _____
 Field_Cit : _____
 Longitude : _____
 Latitude : _____

CASE REVIEW

Inspection Date: 9/28/99
 Inspector Number: 18543

Inspection Seq.: 1 Samples Number: 0

Docket Number : _____ Case Number : _____
 Linked Docket 1: _____ Linked Case 1: _____
 Linked Docket 2: _____ Linked Case 2: _____
 Linked Docket 3: _____ Linked Case 3: _____
 Linked Docket 4: _____ Linked Case 4: _____

Site Name: ASHLAND CHEMICAL Co.
 File Number: 99-005W
 Referral Type: _____ Region/State: _____
 Legislation Ind: T CBI: y n ✓
 Case Review Officer: CREAMER
 Date Review Started: 11/20/99
 Date Review Completed: 11/20/99
 Action Warranted: NO
 Investigation Type: WPF

REMARKS: CLOSE OUT - NO ACTIVE PC
 ACTTYPE: CLOSE OUT TRANS
 CASE DEVELP: _____
 CASE NUM: _____
 DOCKET NUM: _____
 DATE ORC: _____
 DATE ISSUE: _____

SAMPLES

Inspection Date 1 / 1
 Inspector Number: _____
 Inspection Sequence: _____
 Sample Number: _____

Site Name: _____
 Lab Name: _____
 Sample Medium: _____
 Prod Reg #: _____
 Date Sample Sent: 1 / 1
 Date Results Received: 1 / 1
 Violative: _____

REMARKS: _____

FTTS TRACKING SYSTEM CODES ~ TSCA

Revised 1/99

TSCA REASON FOR INSPECTION CODES

Code	Description
CAI	Compliance Assistance
FCA	For Cause, Associated
FCD	For Cause, Disposal
FCF	For Cause, Follow-Up
FCG	For Cause, Government
FCH	For Cause, Headquarters
FCP	For Cause, Private Citizen/Press Complaint
FCR	For Cause, Regulated Community Complaint
FCV	For Cause, Violation
NSA	Neutral Scheme, Associated
NSF	Neutral Scheme, Follow-Up
NSH	Neutral Scheme, Headquarters
NSI	Neutral Scheme, Indian Tribe
NSR	Neutral Scheme, Region
NSS	Neutral Scheme, State
OVR	SWC Overview Inspection
SCD	Secondary Inspection

TSCA INVESTIGATION TYPES

Code	Description
13I	Section 13 Importer Inspection
13R	Section 13 Records Review
2XP	Section 12 Export
4CI	Section 4 Inspections
4EE	Section 4 Ecological Effects Data Audit
4HE	Section 4 Health Effects Data Audit
4LP	Section 4 Good Laboratory Practices
SCE	Section 5 Chemical Substance Exemption
SCI	Section 5 Inspections
SEF	Section 5 (E) of (F) Order
SPN	Section 5 Failure to Notify
SPM	Section 5 Premanufacture Notice
SSU	Section 5 Significant New Use Rule
STM	Section 5 Test Marketing Exemption
6AA	Section 6 Asbestos SEE Conducted
6AF	Section 6 Asbestos Federal Conducted
6AS	Section 6 Asbestos State Conducted
6CF	Section 6 Chlorofluorocarbons
6CI	Section 6 Inspections
6CR	Section 6 Hexavalent Chromium
6CS	State Hexavalent Chromium
6DX	Section 6 Dioxin
6PA	Section 6 PCB SEE Conducted
6PF	Section 6 PCB Federal Conducted
6PS	Section 6 PCB State Conducted
6WA	Section 6 Asbestos Worker Protection SEE
6WF	Section 6 Asbestos Worker Protection Federal
6WS	Section 6 Asbestos Worker Protection State
7CI	Section 7 Inspections
7IH	Section 7 Imminent Hazard
8CI	Section 8 Confidential Inspections
8CR	Section 8C Records Rule
8HS	Section 8D Health and Safety Studies
8LA	Section 8A Level A Rule
8NV	Section 8 Inventory Rule
8SR	Section 8E Substantial Risk
ACO	Asbestos ASHAA Close Out
AEA	AHERA, Enforcement, SEE Conducted
AEF	AHERA, Enforcement, Federal Conducted
AES	AHERA, Enforcement, State Conducted
AMA	Asbestos, MAP Enforcement, SEE
AMF	Asbestos, MAP Enforcement, Federal
AMS	Asbestos, MAP Enforcement, State
ANE	Asbestos, NESHAPS
AON	Asbestos, ASHAA Ongoing
APA	Asbestos, ASHAA Pre Award
AUN	Asbestos, ASHAA Unfunded
L2A	Lead, Section 402, SEE
L2F	Lead, Section 402, Federal
L2S	Lead, Section 402, State
L4A	Lead, Section 404, SEE
L4F	Lead, Section 404, Federal
L4S	Lead, Section 404, State
L6A	Lead, Section 406, SEE
L6F	Lead, Section 406, Federal
L6S	Lead, Section 406, State
L8A	Lead, Section 1018, SEE
L8F	Lead, Section 1018, Federal
L8S	Lead, Section 1018, State

TSCA FACILITY FUNCTION CODES

Code	Description
AG	Agent Facility
BK	Broker
CM	Commercial Facility
CO	Child Occupied Facility/Misc
CV	Conveyor
DA	Permitted Disposer - Alternative Methods
DH	Permitted Disposer - High Efficiency Boilers
DI	Permitted Disposer - Incinerator
DL	Permitted Disposer - Landfill
DM	Permitted Disposer - Dredge/Sludge Material
DP	Disposer
DR	Permitted Disposer - Research/Develop
DT	Distributor
HD	Section (8) HUD Homes
LB	Laboratory
LL	Landlord/Renter Facility
MI	Manufacturer/Importer
MM	Manufacturer
PB	Public Facility
PC	Processor
PR	Private Facility
PS	Secondary Processor
PT	Port of Entry
RB	Renovator Place of Business
RE	Real Estate/Broker Facility
ST	Storer
TH	Target Housing/Bridges
TR	Training Facility/Provider
US	User

FIFRA/TSCA ENFORCEMENT ACTION TYPES

Code	Description
14W	14(A)(2) Notice of Warning
9WR	9(C)(3) Notice of Warning
ADL	Advertising/Advising Letter
APN	AHERA Pilot NON Program
CC	Civil Admin Complaint
CCA	Civil Complaint - Audit Policy
CCR	Civil Admin Referred to DOJ
CIN	Criminal Injunction
CRM	Criminal Action
CSP	Civil Subpoena
CSZ	Civil Seizure
FNN	Federal Notice of Noncompliance
FNS	Significant Federal NON - Major or Minor Action
FRE	Formal Recall
IRE	Informal Recall
NOD	Notice of Detention
NOI	Notice of Intent to Terminate Establishment Registration
NON	Notice of Noncompliance
NOV	Notice of Violation
NOT	Notice of Determination
PPR	PCB Permit Revocation
PPS	PCB Permit Suspension
RAC	D, S, M, R of Application Certificate
SSU	Stop Sale, Use, or Removal Order
TER	Termination of Establishment Registration

FIFRA/TSCA REFERRAL TYPES

Code	Description
27	Section 26/27 Referral
ER	EPA to HUD referral
HR	HUD to EPA referral
QR	Headquarters to Region referral
RQ	Region to Headquarters referral
RR	Region to Region referral
RS	Region to State referral
SR	State to Region referral

PRELIMINARY REVIEW

DETERMINATION OF PENDING ACTION WORK SHEET

TSCA 6(e) INSPECTIONS

FILE NUMBER: 99-005W

PARENT COMPANY: ASHLAND CHEMICAL CO.

FACILITY NAME & P.O. BOX 391

LOCATION: ~~AS~~ KENOVA/NEAL, WV 25530

DATE OF INSPECTION: 9/28/99

INSPECTOR NAME: S. PRICE

ACTION BASED ON PRELIMINARY REVIEW: CLOSEOUT

DATE OF PRELIMINARY REVIEW: 11/20/99

NAME OF REVIEWER: CREAMER

CASE REVIEWER ASSIGNED: CREAMER

DATE ASSIGNED: 11/20/99

COMMENTS: NO ACTIVE PCB TRANSFORMERS

CASE REVIEWER EVALUATION COMPLETED: 11/20/99

CASE REVIEWER INITIALS: CCC

CASE TYPE: NON COMPLAINT CLOSEOUT REFERRAL

ACTION: _____ ISSUED ON: _____

SETTLEMENT CONFERENCE HELD ON: _____

CONSENT AGREEMENT SIGNED ON: _____

CASE CLOSED ON: 11/20/99 _____

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

Wheeling Office - Methodist Bldg.
1060 Chapline Street, Suite 303
Wheeling, West Virginia 26003-2995

SUBJECT: TSCA Section 6e (PCB) Inspection Report **DATE:** November 4, 1999

FROM: Scott Rice (3WC33)
Environmental Protection Specialist, Toxics Programs and Enforcement Section

TO: Charlene Creamer (3WC33)
PCB Compliance Coordinator, Toxics Enforcement and TRI Section

Dear Charlene:

Attached are the PCB Inspection Reports for Columbia Gas Transmission, St Albans Area Office, conducted on 9/21/98 and Ashland Chemical Company conducted on 9/28/99. Please call me if you have any questions or require additional information.

Regards, Scott

**TOXIC SUBSTANCES CONTROL ACT
SECTION 6e (PCB) INSPECTION REPORT**

Facility: Ashland Chemical Company
Big Sandy River Road
Kenova, WV 25530

[Report contains no CBI]

Date of Inspection: 9/28/99

Facility Representatives: Scott Hanks, Technical Supervisor
Harold Hicks, Plant Manager

EPA Representative: Scott Rice, Environmental Protection Specialist
Waste and Chemicals Management Division
Toxics Programs and Enforcement Branch

Reason for Inspection: Facility was chosen as part of EPA's Neutral Inspection Scheme.

TSCA Section 6 (e) PCB Inspection

Ashland Chemical Company (Ashland)
Big Sandy River Road
Kenova, WV 25530

Date of Inspection: September 28, 1999

EPA Representative:

Scott Rice
Environmental Protection Specialist

Facility Representatives:

Robert S. Hanks
Technical Supervisor

Harold Hicks
Plant Manager

Background

This location was chosen for a Toxic Substances Control Act (TSCA) PCB 6(e) inspection to determine compliance with the regulations. The facility was chosen for an inspection under EPA's Neutral Inspection Scheme.

Inspection Observations

Opening Conference

The EPA inspector (Scott Rice) arrived at the facility at 1:00 P.M. on September 28, 1999, and was met by Robert S. Hanks, Technical Supervisor and Harold Hicks, Plant Manager for Ashland Chemical Co. The EPA inspector presented credentials to Messrs. Hanks and Hicks for identification as an authorized inspector for the EPA Regional Administrator. Mr. Rice then presented and explained the TSCA Notice of Inspection, the TSCA Inspection Confidentiality Notice, and a Receipt for Documents form to Mr. Hanks. Mr. Hanks read and signed the forms (Attachments 1, 2, and 3 respectively).

During the opening conference, Mr. Hanks provided the EPA inspector with Ashland Chemical Co.'s last Annual PCB Document Log (for the year 1989), PCB status inventory sheet for oil-filled transformers and oil circuit breakers (OCB) located at the facility, and Manifests for Disposal/Certificates of Destruction for the PCB oil removed from four PCB-transformers, and capacitors located at the facility in April and May, 1991. Analytical data (located on the PCB status inventory sheet) for samples collected from the four transformers after they were retrofilled was also provided and indicated that PCB concentrations in the four transformers were below 10 mg/kg PCBs.

Mr. Hanks indicated that there are no PCB-transformers, PCB-contaminated transformers, capacitors, or PCB contaminated hydraulic equipment in use or stored at the Ashland Chemical Company facility.

Facility Description

The primary activity at the facility is production of maleic anhydride for use in the fiberglass polymer industry. According to Mr. Hanks, the facility encompasses approximately five acres of topographically flat land in an industrialized area of Neal, WV. Adjacent properties consist of a natural gas compressor station to the north, an undeveloped, wooded area to the south, the Big Sandy River to the west and Big Sandy River Road to the east. The facility is completely enclosed with an eight-foot high chain link fence and is maintained by 24-hour security.

Facility Tour

Following the opening conference, the EPA inspector and Mr. Hanks began a tour to observe the facility's non-PCB transformers and non-PCB OCB units. Photographs of the facility's non-PCB transformers and OCB units are included as Attachment 7 of this report. Listed below are the observations noted by the EPA inspector.

Non-PCB Transformers and Oil Circuit Breakers

The non-PCB Transformers and OCB units are all located within the fenced confines of the Ashland Chemical Company facility. The transformers were located on cement pads within eight foot high chain link fences. The OCB units are elevated on metal legs on cement pads. The transformers and OCB units all had non-PCB labels on them. There were no signs of spills or leaks around the transformers or OCB units.

Recordkeeping

As previously mentioned, Mr. Hanks provided the EPA inspector with records associated with PCB activities, consisting of Ashland Chemical Company's last Annual PCB Document Log (for the year 1989), PCB status inventory sheet for oil-filled transformers and OCB units located at the facility, and manifests/Certificates of Destruction for the PCB oil which was removed from four PCB-transformers located at the facility in April and May, 1991.

Closing Conference

At the conclusion of the subject inspection, the EPA inspector provided Mr. Hanks a preliminary summary of findings.

Attachment

1. Notice of Inspection
2. TSCA inspection Confidentiality Notice
3. Receipt for Documents
4. 1989 PCB Annual Document
5. Transformer and Oil Circuit Breaker PCB status
6. Manifests for Disposal and Certificates of Destruction for PCB
-contaminated oil and capacitors
7. Photographic Documentation

Summary of Findings

On September 28, 1999, a representative from EPA Region III's Waste and Chemicals Management Division conducted a TSCA - PCB Compliance Inspection at Ashland Chemical Company located in Neal, West Virginia. Ashland Chemical Company does not maintain, use or store PCB transformers, capacitors, or any other PCB or PCB-contaminated equipment. No violations of the PCB regulations were observed during the inspection.

Attachment 1



US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

1. INVESTIGATION IDENTIFICATION			3. FACILITY NAME
DATE	INSPECTION NO.	DAILY SEQ. NO.	Ashland Chemical Co.
9-28-99	18543	1	
2. INSPECTOR'S ADDRESS			4. FACILITY ADDRESS
1060 Chapline St. Wheeling, WV 26003			Ashland Spec. Chem Co. / Big Sandy River PO Box 391 Ashland Ky 41114 / Kenova, WV 2553

For Internal EPA Use. Copies may be provided to recipient as acknowledgment of this notice.

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures, articles containing same are manufactured, processed, stored or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyances being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act are applicable to the chemical substances, mixtures, or articles within, or associated with, such premise or conveyance have been complied with.

☐ In addition, this inspection extends to (check appropriate blocks):

- | | |
|--|--|
| <input type="checkbox"/> A. Financial data | <input type="checkbox"/> D. Personnel data |
| <input type="checkbox"/> B. Sales data | <input type="checkbox"/> E. Research data |
| <input type="checkbox"/> C. Pricing data | |

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR'S SIGNATURE		RECIPIENT'S SIGNATURE	
NAME		NAME	
SCOTT RICE		Robert Scott Hanks	
TITLE	DATE SIGNED	TITLE	DATE SIGNED
EPS Inspector	9/28/99	Technical Supervisor	9/28/99

Attachment 2



TSCA INSPECTION CONFIDENTIALITY NOTICE

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

1. Investigation Identification			2. Firm Name
Date 9-28-99	Inspector No. 18543	Daily Seq. No. 1	Ashland Chemical Inc.
3. Inspector Name SCOTT RICE			4. Firm Address Big Sandy River Road Kenova, WV 25830
5. Inspector Address 1060 Chapline St. Wheeling, WV 26003			6. Chief Executive Officer Name
			7. Title

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of the Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:

I have received and read the notice.

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.

Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			
Signature <i>Scott Rice</i>		Name Robert Scott Hanks	
Name SCOTT RICE		Title Technical Supervisor	
Title EPA Inspector	Date Signed 9/28/99	Address Big Sandy River Road, Kenova WV 25830	

Attachment 3



TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR SAMPLES AND DOCUMENTS

1. INVESTIGATION IDENTIFICATION			2. COMPANY NAME
DATE 9-28-99	INSPECTION NO. 18543	DAILY SEQ. NO. 1	Ashland Chemical Co.
3. INSPECTOR ADDRESS 1060 Chapline St. Wheeling, WV 26003			4. COMPANY ADDRESS Big Sandy River Road Kenova, WV 25530

For internal EPA use. Copies of this form may be provided to recipient as acknowledgement of the documents and samples of chemical substances and mixtures described below collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
1	7 photos
1	Copies of manifests, annual report and inventory ? PCB Ballast memo.

OPTIONAL:

DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED ☐

NOT REQUESTED ☐

INSPECTOR SIGNATURE 		CLAIMANT SIGNATURE Robert S. Hanks	
NAME SCOTT RICE		NAME Robert S. Hanks	
TITLE EPS Inspector	DATE SIGNED 9-28-99	TITLE Technical Supervisor	DATE SIGNED 9-28-99

Attachment 4

NEAL PCB STATUS REPORT

1989

Item -----	Description -----	ppm PCBs -----	Weight -----
15 Capacitor	NA	>500	large

Item -----	Description -----	ppm PCBs -----	Weight -----
Transformer	SEV 4480-1	259	200 gal
Transformer	PAV 7809-01	125	207 gal
Transformer	PAV 7809-02	107	207 gal

Please sign below indicating that this report accurately shows the PCB status as of 12/31/88. If it is not correct please note the changes and sign.

Signature

Al Edmund

Date

6/22/90

Should be 12/31/89?

MEMORANDUM

June 18, 1990

To: Distribution
From: PF Horstmann
Subject: PCB Annual Report - 1989

By July 1, 1990, Ashland Chemical must file the 1989 annual report which applies to all PCB items in service or projected for disposal during calendar 1989.

The information from your 1988 facility report has been transferred to a 1989 report which is attached.

Please review this report. Correct any mistakes and provide information on any changes for calendar year 1989. These include PCB items removed from service, placed into storage for disposal, or placed into transport for disposal. Please furnish dates, numbers and weights of PBC items and the names of disposal facilities.

After completing any correction, additions, or noting changes, please sign, date and return the report to me by July 1, 1990.

Please call if you have any questions.

Distribution:

Jack Matson - Cleveland West
Joe Moklak - Calumet City
Dave Drummond - Neal
Gorden Denker - Plaquemine

cc:

R. H. Toeniskoetter
R. R. Grulkowski
T. Cantor
W. J. Boyne
C. Kriston

JUN 22 1990

ASHLAND CHEMICAL

Attachment 5

NEAL PLANT OIL FILLED TRANSFORMER AND OCB PCB STATUS

								Present
Number	Description	Manufacture	Serial Number	Equipment Type	Sample Number	PCB Content	Test Date	PCB Status
36	Neal Main Sub 69 KV	Kuhlman	2-59384	Trans	O110	N.D.	9/20/85	Non-PCB
36	XFMR Bush A					Unknown	None	
36	XFMR Bush B					Unknown	None	
36	XFMR Bush C					Unknown	None	
37	OCB-N	G.E.	O203A5267-201	OCB	O111	N.D.	9/20/85	Non-PCB
37	U37 Bush PA					Unknown	None	
37	U37 Bush PB					Unknown	None	
37	U37 Bush PC					Unknown	None	
37	U37 Bush SA					Unknown	None	
37	U37 Bush SB					Unknown	None	
37	U37 Bush SC					Unknown	None	
38	OCB-M	G.E.	O203A5267-202	OCB	O112	N.D.	9/20/85	Non-PCB
38	U38 Bush PA					Unknown	None	
38	U38 Bush PB					Unknown	None	
38	U38 Bush PC					Unknown	None	
38	U38 Bush SA					Unknown	None	
38	U38 Bush SB					Unknown	None	
38	U38 Bush SC					Unknown	None	
235	MCC Trans 180A	Westinghouse	PAV 7809-01	Trans	20862	8 PPM	9/9/91	Non-PCB
236	MCC Trans 181A	Westinghouse	PAV 7809-02	Trans	20861	10 PPM	9/9/91	Non-PCB
237	Neal C-110 182A	Westinghouse	SEV 4480-01	Trans	20863	35 PPM	9/9/91	Non-PCB
238	Neal C-111	RTE Small Power	876008529	Trans	N/A	MFG	MFG	Non-PCB
239	Neal D-209 MCC	Balteau	PSK0861	Trans	N/A	MFG	MFG	Non-PCB
240	Neal MCC D-208 TR-3A	G.E.	Q109418-TNH	Trans	N/A	MFG	MFG	Non-PCB

Attachment 6

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas not required by Federal law.	
3. Generator's Name and Mailing Address ASHLAND CHEMICAL, NEAL PLANT PO BOX 391 ASHLAND, KY 41114		SITE: BIG SANDY RIVER RD. NEAL, WV		A. State Manifest Document Number		
4. Generator's Phone () 304 453-6101		6. US EPA ID Number 08D987012838		B. State Generator's ID		
5. Transporter 1 Company Name TRANSTEC ENVIRONMENTAL, INC.		7. Transporter 2 Company Name		C. State Transporter's ID		
9. Designated Facility Name and Site Address ENSR OPERATIONS 1501 RAFF RD., SW CANTON, OH 44710		8. US EPA ID Number 08D981100969		D. Transporter's Phone 216-875-1419		
		10. US EPA ID Number		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone 216-477-3474		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. Hazardous Substance, liquid, n.o.s., ORM-E, NA9188, (Polychlorinated biphenyls), RQ 0.454 K		No. Type				
		001 TT 039463				
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above		11.A. OIL ITEM 13.A. IS A FIELD ESTIMATE. ACTUAL METERED READING WILL BE PROVIDED BY RECEIVING FACILITY. ACTUAL:		K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information		24 HR. EMERGENCY CONTACT 216-875-1419 TT NO. 20675				
STORAGE DATE: 4-18-91 ID OF CONTAINER: 7809-02 TLR: 7446						
COMPARTMENT: 3 758-AA 09726 7809-01 4480-01						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name Steve Calvert		Signature <i>Steve Calvert</i>		Month Day Year 04/18/91		
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name JOE SHANDLE		Signature <i>Joe Shandle</i>		Month Day Year 04/18/91		
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Month Day Year		

April 24, 1991

ENSR Operations

1700 Gateway Boulevard S.E.
Canton, Ohio 44707
216-452-0837

Mr. L. Keith Smith (HC-1)
Refinery Engineering
Ashland Oil Company
P. O. Box 391
Ashland, KY 41114

RE: Confirmation of Receipt of PCB Contaminated Bulk Oil

Dear Mr. Smith:

Please find attached a copy of Manifest #04442 for PCB contaminated bulk oil received by ENSR Operations. To verify delivery of the waste shown on this manifest, please contact Mr. Kim Grandison, ENSR Waste Receiving Supervisor, at (216) 430-4466.

A Certificate of Disposal for PCB contaminated bulk oil will be sent to you after the oil has been processed. If you have any questions regarding the enclosed, please call.

Sincerely,

ENSR Operations



Barbara L. Kerhin
Central Waste Management Group

Attns.

Work Order File # 2539
Job File # 4442

cc(1): Mr. Steve Calvert
Ashland Chemical, Neal Plant
P. O. Box 391
Ashland, KY 41114

cc(2): Mr. Troy Hawkins/ENSR Retrofill Divn.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. W-V-D-0-8-0-6-4-5-8-3-1-0-4-4-4-2	Manifest Document No. 0-4-4-4-2	2. Page 1 of 1	Information in the shaded areas not required by Federal law.
3. Generator's Name and Mailing Address ASHLAND CHEMICAL, NEAL PLANT PO BOX 391 ASHLAND, KY 41114		SITE: BIG SANDY RIVER RD. NEAL, WV		A. State Manifest Document Number	
4. Generator's Phone (304) 453-6101				B. State Generator's ID	
5. Transporter 1 Company Name TRANSTEC ENVIRONMENTAL, INC.		6. US EPA ID Number O-H-D-9-8-7-0-1-2-8-3-8		C. State Transporter's ID	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 216-875-1419	
9. Designated Facility Name and Site Address ENSR OPERATIONS 1501 RAFF RD., SW CANTON, OH 44710		10. US EPA ID Number O.H.D.9.8.1.1.0.0.9.6.9		E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone 216-477-3474	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. HM Hazardous Substance, liquid, n.o.s., ORM-E, NA9188, (Polychlorinated biphenyls), RQ 0.454 K		No. Type			
		10-1 T T	03946	K	
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above 11.A. OIL IT ESTIMATE. ACTUAL METERED READING WILL BE RECEIVING FACILITY. ACTUAL: 1072 WOR EN					
15. Special Handling Instructions and Additional Information 24 HR. E STORAGE DATE: 4/18-9/ID OF CONTAINER: 780 COMPARTMENT: 3 758-AA 09726 780 448					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this cons marked, and labeled, and are in all respects in proper condition for transport by hi If I am a large quantity generator, I certify that I have a program in place to reduce the and that I have selected the practicable method of treatment, storage, or disposal curr OR, if I am a small quantity generator, I have made a good faith effort to minimize m afford.					
Printed/Typed Name STEVE CALVERT					
17. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name JOE SHANDLE					
18. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name					
19. Discrepancy Indication Space					
CINE 13A SHOULD READ 3535 K					
20. Facility Owner or Operator: Certification of receipt of hazardous materic					
Printed/Typed Name GEORGE PIPUS					

GENERATOR

TRANSPORTER

FACILITY

STEVE,
FOR YOUR
RECORDS, PLEASE
STAPLE TO YOUR
COPY OF THIS
MANIFEST DOCUMENT
04442. PLEASE
RETAIN IN YOUR
FILES FOR A
LONG TIME, NOTE
THAT I HAVE
PHONED ENSR &
VERIFIED RECEIPT
(AT BTM OF MANIFEST)
CALL IF YOU HAVE
QUESTIONS. Thank

4/26/91 RECEIVED ORIGINAL - RETURN TO GENERATOR AS NOTED ABOVE. 7 BLS C5
4/26/91

ENSR Operations
1700 Gateway Boulevard
Canton, Ohio 44707
216-452-0837

May 28, 1991

Mr. L Keith Smith (HC-1)
Refinery Engineering
Ashland Oil Company
PO Box 391
Ashland KY 41114

Re: Confirmation of Disposal of PCB Material


Dear Mr. Smith:

Please find enclosed the Certificate of Disposal for PCB contaminated oil received by ENSR Operations.

If you have any questions or need further assistance, please feel free to call.

Sincerely,

ENSR OPERATIONS



Barbara L. Kerhin
Central Waste Management Group

Attmt.

BLK/mlm

W.O. File: #2539
Job File: #4442

cc: Mr. Steve Calvert
Ashland Chemical, Neal Plant
PO Box 391
Ashland KY 41114

cc: Troy Hawkins/ENSR Retrofill Division

ENSR Operations

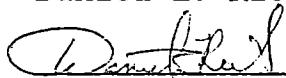
1700 Gateway Boulevard S.
Canton, Ohio 44707
216-452-0837CERTIFICATE NO. ENSR2539CERTIFICATE OF DISPOSAL**ASHLAND CHEMICAL**Mailing Address: PO Box 391
Ashland KY 41114Pickup Location: Big Sandy River Road
Neal WV

As of the 19th day of May, 1991, MODEF received from Ashland Chemical, described on invoice number 8162, dated April 22, 1991, PCBX Job Number 101132, work order number 2539, and Manifest number 04442 was disposed of by chemical treatment in ENSR's PCBX Unit Number OHD986978971 (Rig 2).

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

ENSR OPERATIONS

BY: Daniel E. Riel



TITLE: PCBX Operations Manager

DATE: 5/29/910690
S0290
RAM/DER/bk

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. W-V-D-0-8-0-6-4-5-8-3-1-0-4-4-4-2	Manifest Document No. 0-4-4-4-2	2. Page 1 of 1	Information in the shaded areas not required by Federal law.	
3. Generator's Name and Mailing Address ASHLAND CHEMICAL, NEAL PLANT PO BOX 391 ASHLAND, KY 41114		SITE: BIG SANDY RIVER RD. NEAL, WV		A. State Manifest Document Number		
4. Generator's Phone (304) 453-6101				B. State Generator's ID		
5. Transporter 1 Company Name TRANSTEC ENVIRONMENTAL, INC.		6. US EPA ID Number O-H-D-9-8-7-0-1-2-8-3-8		C. State Transporter's ID		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 216-875-1419		
9. Designated Facility Name and Site Address ENSR OPERATIONS 1501 RAFF RD., SW CANTON, OH 44710		10. US EPA ID Number O.H.D.9.8.1.1.0.0.9.6.9		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone 216-477-3474		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. [HM] Hazardous Substance, liquid, n.o.s., ORM-E, NA9188, (Polychlorinated biphenyls), RQ 0.454 K		No. Type				
		001 T T		03946	K	
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above 11.A. OIL IT ESTIMATE. ACTUAL METERED READING WILL BE RECEIVING FACILITY. ACTUAL: 1072 WOR ENS		STEVE, FOR YOUR RECORDS, PLEASE STAPLE TO YOUR COPY OF THIS MANIFEST. DOCUMENT # 04442. PLEASE RETAIN IN YOUR FILES FOR A LONG TIME, NOTE THAT I HAVE PHONED ENSR & VERIFIED RECEIPT (AT BTM OF MANIFEST) CALL IF YOU HAVE QUESTIONS. Keith				
15. Special Handling Instructions and Additional Information 24 HR. E STORAGE DATE: 4-18-91/D OF CONTAINER: 780 COMPARTMENT: 3 758-AA 09726 780 448						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this cons marked, and labeled, and are in all respects in proper condition for transport by hi If I am a large quantity generator, I certify that I have a program in place to reduce th and that I have selected the practicable method of treatment, storage, or disposal curr OR, if I am a small quantity generator, I have made a good faith effort to minimize m afford.						
Printed/Typed Name STEVE CALVERT						
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name JOE SHANDLE						
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name						
19. Discrepancy Indication Space						
CINE 13A SHOULD READ 3535 K						
20. Facility Owner or Operator: Certification of receipt of hazardous materic						
Printed/Typed Name GEORGE PIPUS						

ENSR Operations
1700 Gateway Boulevard
Canton, Ohio 44707
216-452-0837

May 28, 1991

Mr. L Keith Smith (HC-1)
Refinery Engineering
Ashland Oil Company
PO Box 391
Ashland KY 41114

Re: Confirmation of Disposal of PCB Material

Dear Mr. Smith:

Please find enclosed the Certificate of Disposal for PCB contaminated oil received by ENSR Operations.

If you have any questions or need further assistance, please feel free to call.

Sincerely,

ENSR OPERATIONS



Barbara L. Kerhin
Central Waste Management Group

Attmt.

BLK/mlm

W.O. File: #2539
Job File: #4442

cc: Mr. Steve Calvert
Ashland Chemical, Neal Plant
PO Box 391
Ashland KY 41114

cc: Troy Hawkins/ENSR Retrofill Division

ENSR

ENSR Operations

1700 Gateway Boulevard S.
Canton, Ohio 44707
216-452-0837

CERTIFICATE NO. ENSR2539

CERTIFICATE OF DISPOSAL

ASHLAND CHEMICAL

Mailing Address: PO Box 391
Ashland KY 41114

Pickup Location: Big Sandy River Road
Neal WV

As of the 19th day of May, 1991, MODEF received from Ashland Chemical, described on invoice number 8162, dated April 22, 1991, PCBX Job Number 101132, work order number 2539, and Manifest number 04442 was disposed of by chemical treatment in ENSR's PCBX Unit Number OHD986978971 (Rig 2).

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

ENSR OPERATIONS

BY: Daniel E. Riel



TITLE: PCBX Operations Manager

DATE: 5/22/91

0690
S0290
RAM/DER/bk

**UNIFORM HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

Manifest
Document No.

2. Page 1

Information in the shaded ar
is not required by Federal law

W V D 0 8 0 6 4 5 2 3 1 A U 7 7 A

of 1

3. Generator's Name and Mailing Address

Ashland Chemicals**Maleic Plant/Big Sandy River Road****Neal, WV 25530**

A. State Manifest Document Number

B. State Generator's ID

4. Generator's Phone (**606**) **327-6593**

5. Transporter 1 Company Name

Aptus, Inc.

6. US EPA ID Number

M E D 9 8 0 7 9 1 3 2 1

C. State Transporter's ID

D. Transporter's Phone **612-469-347**

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

Aptus, Inc.**P.O. Box 1328/Hwy. 169 North****Coffeyville, KS 67337**

10. US EPA ID Number

K S D 9 8 0 9 6 4 9 9 3

G. State Facility's ID

H. Facility's Phone

316-251-6380

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

12. Containers

No. Type

13.
Total
Quantity14.
Unit
Wt/Vol

1. Waste No.

a.

**RQ HAZARDOUS SUBSTANCE, SOLID, N.O.S.,
ORM-E, NA 9188(POLYCHLORINATED BIPHENYLS)**

202 D M 49750

K

PCB2

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

a. drum of capacitors Storage Date 01/11/91**SEE ATTACHMENT**

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

See Enclosed Contingency Plan**Work Order #70859****EMERGENCY CONTACT: 1-800-292-2558**

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

APTUS

April 30, 1991

Aptus

Environmental Services

P.O. Box 1328

Coffeyville, KS 67337

(316) 251-6380

FAX (316) 251-7498

Sales FAX (316) 251-1095

Incinerator FAX (316) 251-0086

ENVIRONMENTAL OFFICE
ASHLAND CHEMICALS
MALEIC PLNT/BIG SANDY RIVER RD
NEAL, WV 25530-

RE: ASHLAND CHEMICALS, Aptus Document No. AU77A

Dear ENVIRONMENTAL OFFICE:

Enclosed, please find your copy of the hazardous waste manifest indicating that your waste material has been received and accepted by Aptus.

Immediately following the disposal of all your material, you will receive a complete Certificate of Disposal.

Once again, Aptus would like to express our appreciation to you as a valued customer. Should you have any questions, please feel free to contact our Customer Service Representative in Sales from 8:00 AM to 5:00 PM, Monday through Friday.

Sincerely,



Environmental Affairs

Enclosure

APTUS

A Westinghouse Company

TO:

Ashland Petroleum
P.O. Box 391
Ashland, KY 41114

Environmental Services
21750 Cedar Avenue
P.O. Box 550
Lakeville, MN 55044
(612) 469-3475
FAX (612) 469-5140
MND 981190242

Environmental Services
Highway 169 North
P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380
FAX (316) 251-1095
KSD 980964993

Environmental Se
4120 South 500 V
Murray, UT 84123
(801) 265-2323
FAX (801) 265-23
UTD 9815521

QUOTATION**No. Q**

32801

ATTENTION: Steve Calvert
PHONE: _____

INQUIRY NO.: _____

DATE: 3/13/91

DESCRIPTION

We are pleased to submit the following offer. This offer expressly limits acceptance to the terms hereof, including those on the back of this form.

Aptus of Coffeyville, Kansas will pick-up, transport, and properly dispose of PC contaminated capacitors. The capacitors will be shredded and incinerated in stric accordance with EPA regulations set forth in 40 CFR 761.60. The capacitors mus be in DOT approved shipping containers. Owner is responsible for loading the approve shipping containers onto Aptus' disposal vehicle. Total cost includes pick-up transportation, labor, manifest, disposal costs, and Certificate of Destruction Please see enclosed Quotation clarification.

CAPACITOR DISPOSAL
MATERIAL SPECIFICATIONS

Capacitors in Drums with Pure PCB Content - 1650 pounds

Incinerate: \$1.65/lb Estimated Cost: (\$2,722.50)

By signing this quotation, the customer certifies that materials listed on this quctation and profiled using Aptus' generic profiles are material subject only to the Toxic Substance Control Act (TSCA, CFR 761.-766.187) and contain no Resource Conservation and Recovery Act (RCRA, CFR 261.11-261.33) waste codes.

Prices are based on specifications provided to Aptus. Prices are subject to change if actual specifications differ.
We are an Equal Opportunity Employer

DELIVERY: Per Schedule

F.O.B. Included

Net 30 days from
date of pick up
TERMS:

QUOTE IS VALID FOR 30 DAYS

TRANSPORT: APTUS designated disposal vehicle via best route

T/S/D FACILITY: HVA Approved

ACCEPTED

BY: Steve CalvertTITLE: Plant EngineerP.O. NO.: 16762 - 8129

BY:

Bill Parrish
Aptus

Bill Parrish Sales Representative

WHITE-ORIGINAL

GREEN-CUSTOMER

YELLOW-ACCOUNTING

PINK-SALES FILE

GOLD-CENTRAL FILE

REV. 10

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. W V D 0 8 0 6 4 5 8 3 1										Manifest Document No. A U 7 7 A		2. Page 1 02		Information in the shaded area is not required by Federal law			
3. Generator's Name and Mailing Address Ashland Chemicals Maleic Plant/Big Sandy River Road Neal, WV 25530												A. State Manifest Document Number							
4. Generator's Phone (606) 327-6593												B. State Generator's ID							
5. Transporter 1 Company Name Aptus, Inc.						6. US EPA ID Number M N D 9 8 0 7 9 1 3 2 1						C. State Transporter's ID							
7. Transporter 2 Company Name						8. US EPA ID Number						D. Transporter's Phone 612-469-347							
9. Designated Facility Name and Site Address Aptus, Inc. P.O. Box 1328/Hwy. 169 North Coffeyville, KS 67337						10. US EPA ID Number K S D 9 8 0 9 6 4 9 9 3						E. State Transporter's ID							
												F. Transporter's Phone							
												G. State Facility's ID							
												H. Facility's Phone 316-251-6380							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)												12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. RQ HAZARDOUS SUBSTANCE, SOLID, N.O.S., FORM-E, NA 9188(POLYCHLORINATED BIPHENYLS)												No. 008		Type D M		EST 00750		K PCB2	
b.																			
c.																			
d.																			
J. Additional Descriptions for Materials Listed Above												K. Handling Codes for Wastes Listed Above							
a. drums of capacitors Storage Date 04-16-91 SEE ATTACHMENT																			
15. Special Handling Instructions and Additional Information See Enclosed Contingency Plan Work Order #70859 EMERGENCY CONTACT: 1-800-292-2558																			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.																			
Printed/Typed Name STEVE CALVERT												Signature Steve Calvert				Month Day Year 04/17/91			
17. Transporter 1 Acknowledgement of Receipt of Materials																			
Printed/Typed Name CHESTER BROWN												Signature Chester Brown				Month Day Year 04/17/91			
18. Transporter 2 Acknowledgement of Receipt of Materials																			
Printed/Typed Name												Signature				Month Day Year			
19. Discrepancy Indication Space Discrepancy Ok'd by Steve Calvert 4-26-91 11a. 8 dms capacitors 2064 lbs., 938 kgs. Caw																			
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.																			
Printed/Typed Name Rick Smithson												Signature Rick Smithson				Month Day Year 04/25/91			

APTUS

A Westinghouse Company

TO:

Ashland Oil
Neal Plant
P.O. Box 391
Ashland, KY 45114

Environmental Services
21750 Cedar Avenue
P.O. Box 550
Lakeville, MN 55044
(612) 469-3475
FAX (612) 469-5140
MND 981190242

Environmental Services
Highway 169 North
P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380
FAX (316) 251-1095
KSD 980964993

Environmental Ser
4120 South 500 W
Murray, UT 84123
(801) 265-2323
FAX (801) 265-2323
UTD 98155217

QUOTATION**No. Q** 387400

ATTENTION: Steve Calvert
PHONE: 606-327-6592

INQUIRY NO.: Neal. WV

DATE: 4/27/91

DESCRIPTION

We are pleased to submit the following offer. This offer expressly limits acceptance to the terms hereof, including those on the back of this form.

Aptus of Coffeyville, Kansas will pick-up, transport, and properly dispose of PC contaminated capacitors. The capacitors will be shredded and incinerated in strict accordance with EPA regulations set forth in 40 CFR 761.60. The capacitors must be in DOT approved shipping containers. Owner is responsible for loading the approved shipping containers onto **Aptus'** disposal vehicle. Total cost includes pick-up transportation, labor, manifest, disposal costs, and Certificate of Destruction. Please see enclosed Quotation clarification.

CAPACITOR DISPOSAL**MATERIAL SPECIFICATIONS**

Capacitors with Pure PCB Content - 160 pounds - (1) Drum

Incineration of Capacitors: \$1.80/lb or
Minimum Stop Charge: \$950.00

By signing this quotation, the customer certifies that materials listed on this quotation and profiled using Aptus' generic profiles are material subject only to the Toxic Substance Control Act (TSCA, CFR 761.-766.187) and contain no Resource Conservation and Recovery Act (RCRA, CFR 261.11-261.33) waste codes.

Prices are based on specifications provided to Aptus. Prices are subject to change if actual specifications differ.
We are an Equal Opportunity Employer

DELIVERY: Per Schedule

F.O.B. Included

Net 30 days from
date of pickup
TERMS:

QUOTE IS VALID FOR 30 DAYS

TRANSPORT:

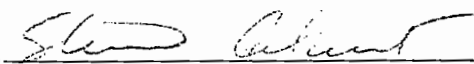
APTUS designated disposal
vehicle via best route.

T/S/D FACILITY:

EPA Approved

ACCEPTED

BY:



TITLE:

Plant Engineer

P.O. NO.:

014562-8159A

BY:

**Aptus**

Bill Parrish, Sales Representative

WHITE: ORIGINAL

GREEN: CUSTOMER

YELLOW: ACCOUNTING

PINK: SALES FILE

COPY: OFFICE FILE

APTUS

March 16, 1992

Aptus
Environmental Services
P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380
FAX (316) 251-7498
Sales FAX (316) 251-1095
Incinerator FAX (316) 251-0089

STEVE CALVERT
ASHLAND OIL
P. O. Box 391
Ashland, KY 41114

RE: Aptus Document No. AU77A
ASHLAND CHEMICALS
MALEIC PLNT/BIG SANDY RIVER RD
NEAL, WV 25530-

DEAR STEVE CALVERT:

The above referenced generator has been issued a Certificate of Disposal (NO. 10699) from APTUS on March 16, 1992 for material received on APTUS Document NO. AU77A.

APTUS would like to express our appreciation to you and hope that we can assist you in solving your waste management needs in the future.

THANK YOU,

ENVIRONMENTAL AFFAIRS

APTUS

March 16, 1992

Aptus
Environmental Services
P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380
FAX (316) 251-7498
Sales FAX (316) 251-1095
Incinerator FAX (316) 251-0085

ENVIRONMENTAL OFFICE
ASHLAND CHEMICALS
MALEIC PLNT/BIG SANDY RIVER RD
NEAL, WV 25530-

RE: Aptus Document No. AU77A

Dear ENVIRONMENTAL OFFICE:

Enclosed, please find your Certificate of Disposal from Aptus, which certifies that your waste material received on the manifest referenced has been properly disposed. Also, enclosed is a detail summary of the movement of your material.

Aptus would like to express our appreciation to you and hope that we can assist you in solving your waste management needs in the future.

Should you have any questions regarding our services, please contact your Customer Service Representative from 8:00 AM to 5:00 PM.

24 Hour Spill Response call 1-800-292-2558 or (316)251-6380.

Enclosures

APTUS

March 16, 1992

Aptus
Environmental Services
P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380
FAX (316) 251-7498
Sales FAX (316) 251-1095
Incinerator FAX (316) 251-0089

CERTIFICATE OF DISPOSAL

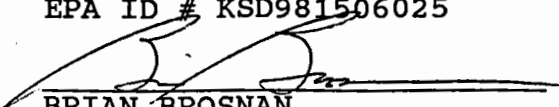
NO. 10699

ASHLAND CHEMICALS
MALEIC PLNT/BIG SANDY RIVER RD
NEAL, WV 25530-

- A. THIS IS TO CERTIFY THAT THE HAZARDOUS SUBSTANCE MANIFESTED TO **APTUS** ON APTUS DOCUMENT #AU77A WAS DISPOSED OF IN ACCORDANCE WITH 40 CFR 761 (AND 40 CFR 264 IF APPLICABLE) AS OF 03/12/92. ATTACHED, IS A DETAIL REPORT WHICH IDENTIFIES THE DATE(S) OF DISPOSAL AND THE PROCESS UTILIZED FOR EACH WASTE LISTED.
- B. UNDER CIVIL AND CRIMINAL PENALTIES OF LAW FOR THE MAKING OR SUBMISSION OF FALSE OR FRAUDULENT STATEMENTS OR REPRESENTATIONS (18 U.S. C. 1001 AND 15 U.S. C. 2615), I CERTIFY THAT THE INFORMATION CONTAINED IN OR ACCOMPANYING THIS DOCUMENT IS TRUE, ACCURATE AND COMPLETE. AS TO THE IDENTIFIED SECTIONS(S) (A.) OF THIS DOCUMENT FOR WHICH I CANNOT PERSONALLY VERIFY TRUTH AND ACCURACY, I CERTIFY AS THE COMPANY OFFICIAL HAVING SUPERVISORY RESPONSIBILITY FOR THE PERSONS WHO, ACTING UNDER MY DIRECT INSTRUCTIONS, MADE THE VERIFICATION THAT THIS INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

APTUS

EPA ID # KSD981506025


BRIAN BROSAN

MANAGER, ENVIRONMENTAL AFFAIRS

Aptus

DETAIL REPORT

PAGE NO. 1

GENERATOR

ASHLAND CHEMICALS

LEIC PLNT/BIG SANDY RIVER RD

CORRESPONDENT

ASHLAND OIL

P. O. Box 391

WORKORDER # 70859

APT DOC # AU77A

CUST MANIFEST:

AL

WW 25530-

Ashland

KY 41114

STATE MANIFEST:

A # WWD080645831

TNE: 6063276593

/IRONMENTAL OFFICE

DE: 0002835

PHONE: 6063276593

STEVE CALVERT

COODE: 0009398

DATE OF REPORT: 03/16/92

SALESMAN:

HOLD BACK: 0%

3M PRDTYPE	CNT	DESCRIPTION	SERIAL/DRUM #	CONCEN	UNT	WT	QTY	UNT	LOCATN	DISPOSAL FACILITY	SHIPMAN	CONUMBER	ACCEPTED	OUT/SRVC	SHIP	DESTROYD	COSENT
1 CAPS	1		1 of 8/G6		268	268.00			4424000	APTUS INCINERATOR COFFEYVILLE,KS	CDL53	10699	04/25/91	04/16/91	03/06/92	03/12/92	03/16/92
2 CAPS	1		2 of 8/G8		272	272.00			4424000	APTUS INCINERATOR COFFEYVILLE,KS	CDL53	10699	04/25/91	04/16/91	03/06/92	03/12/92	03/16/92
3 CAPS	1		3 of 8/G3		162	162.00			4424000	APTUS INCINERATOR COFFEYVILLE,KS	CDL53	10699	04/25/91	04/16/91	03/06/92	03/12/92	03/16/92
4 CAPS	1		4 of 8/G4		268	268.00			4424000	APTUS INCINERATOR COFFEYVILLE,KS	CDL53	10699	04/25/91	04/16/91	03/06/92	03/12/92	03/16/92
5 CAPS	1		5 of 8/G7		268	268.00			4424000	APTUS INCINERATOR COFFEYVILLE,KS	CDL53	10699	04/25/91	04/16/91	03/06/92	03/12/92	03/16/92
6 CAPS	1		6 of 8/G5		278	278.00			4424000	APTUS INCINERATOR COFFEYVILLE,KS	CDL53	10699	04/25/91	04/16/91	03/06/92	03/12/92	03/16/92
7 CAPS	1		7 of 8/G2		282	282.00			4424000	APTUS INCINERATOR COFFEYVILLE,KS	CDL53	10699	04/25/91	04/16/91	03/06/92	03/12/92	03/16/92
8 CAPS	1		8 of 8/G1		266	266.00			4424000	APTUS INCINERATOR COFFEYVILLE,KS	CDL53	10699	04/25/91	04/16/91	03/06/92	03/12/92	03/16/92

IFESTS ON JOB NUMBER 70859

77A

M.C.C. CAPACITORS

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest Document No.

2. Page 1 of 1

Information in the shaded area is not required by Federal law

WV D 0 8 0 6 4 5 8 3 1 B F 0 2 A

3. Generator's Name and Mailing Address

Ashland Chemicals
Maleic Plant/Big Sandy River Road
Neal, WV 25530

A. State Manifest Document Number

B. State Generator's ID

4. Generator's Phone (606) 327-6593

5. Transporter 1 Company Name

Tri-State Motor Transit CO.

6. US EPA ID Number

M O D 0 9 5 0 3 8 9 9 8

C. State Transporter's ID

D. Transporter's Phone **417-624-31**

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

Aptus, Inc.
P.O. Box 1328/Hwy. 169 North
Coffeyville, KS 67337

10. US EPA ID Number

K S D 9 8 1 5 0 6 0 2 5

G. State Facility's ID

H. Facility's Phone

316-251-6380

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

HM

a.

RQ HAZARDOUS SUBSTANCE, SOLID, N.O.S.,
ORM-E, NA 9188(POLYCHLORINATED BIPHENYLS)

12. Containers

No.

Type

13. Total Quantity

14. Unit Wt/Vol

15. Waste No.

2001 D M 2001 40 K PCB2

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

a. drum of capacitors Storage Date 6/1/01

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

See Enclosed Contingency Plan
Work Order #80599
EMERGENCY CONTACT: 1-800-292-2558

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and selected the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Month Day Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month Day Year

APTUS

June 13, 1991

Aptus
Environmental Services
P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380
FAX (316) 251-7498
Sales FAX (316) 251-1095
Incinerator FAX (316) 251-0089

STEVE CALVERT
ASHLAND CHEMICALS
MALEIC PLANT
BIG SANDY RIVER ROAD
NEAL, WV 25530-

RE: ASHLAND CHEMICALS, Aptus Document No. BF02A

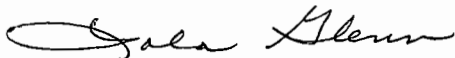
Dear STEVE CALVERT:

Enclosed, please find your copy of the hazardous waste manifest indicating that your waste material has been received and accepted by Aptus.

Immediately following the disposal of all your material, you will receive a complete Certificate of Disposal.

Once again, Aptus would like to express our appreciation to you as a valued customer. Should you have any questions, please feel free to contact our Customer Service Representative in Sales from 8:00 AM to 5:00 PM, Monday through Friday.

Sincerely,



Environmental Affairs

Enclosure

APTUS

March 26, 1992

Aptus
Environmental Services
P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380
FAX (316) 251-7498
Sales FAX (316) 251-1095
Incinerator FAX (316) 251-0089

STEVE CALVERT
ASHLAND CHEMICAL / NEAL PLANT
P. O. Box 391
Ashland, KY 41114

RE: Aptus Document No. BF02A
ASHLAND CHEMICALS
MALEIC PLANT
BIG SANDY RIVER ROAD
NEAL, WV 25530-

DEAR STEVE CALVERT:

The above referenced generator has been issued a Certificate of Disposal (NO. 10884) from APTUS on March 26, 1992 for material received on APTUS Document NO. BF02A.

APTUS would like to express our appreciation to you and hope that we can assist you in solving your waste management needs in the future.

THANK YOU,

ENVIRONMENTAL AFFAIRS

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

W V D 0 8 0 6 4 5 8 3 1 B F 0 2 A

Manifest Document No.

2. Page 1 of 1

Information in the shaded area is not required by Federal law

3. Generator's Name and Mailing Address
Ashland Chemicals
Maleic Plant/Big Sandy River Road
Neal, WV 25530

A. State Manifest Document Number

B. State Generator's ID

4. Generator's Phone (606) 327-6593

5. Transporter 1 Company Name
Tri-State Motor Transit CO.

6. US EPA ID Number

M O D 0 9 5 0 3 8 9 9 8

C. State Transporter's ID

D. Transporter's Phone 417-624-31

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

10. US EPA ID Number

G. State Facility's ID

Aptus, Inc.

P.O. Box 1328/Hwy. 169 North

Coffeyville, KS 67337

K S D 9 8 1 5 0 6 0 2 5

H. Facility's Phone

316-251-6380

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

12. Containers
No. Type

13. Total Quantity

14. Unit Wt/Vol

15. Waste No

HM

a. RQ HAZARDOUS SUBSTANCE, SOLID, N.O.S.,
ORM-E, NA 9188(POLYCHLORINATED BIPHENYLS)

0011

D M

EST
00046

K

PCB2

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

a. drum of capacitors Storage Date 4-19-91

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

See Enclosed Contingency Plan

Work Order #80599

EMERGENCY CONTACT: 1-800-292-2558

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

RON WEST

Signature

Ron West

Month Day Year

05/31/91

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

JAMES D SIMON

Signature

James Simon

Month Day Year

05/31/91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

|||||

19. Discrepancy Indication Space

11a) 1 drum caps = 106 lbs., 48 k. *BR*

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

DAVID COOK

Signature

David Cook

Month Day Year

06/11/91

Aptus

March 26, 1992

STEVE CALVERT
ASHLAND CHEMICALS
MALEIC PLANT
BIG SANDY RIVER ROAD
NEAL, WV 25530-

RE: Aptus Document No. BF02A

Dear STEVE CALVERT:

Enclosed, please find your Certificate of Disposal from Aptus, which certifies that your waste material received on the manifest referenced has been properly disposed. Also, enclosed is a detail summary of the movement of your material.

Aptus would like to express our appreciation to you and hope that we can assist you in solving your waste management needs in the future.

Should you have any questions regarding our services, please contact your Customer Service Representative from 8:00 AM to 5:00 PM.

24 Hour Spill Response call 1-800-292-2558 or (316)251-6380.

Enclosures

APTUS

March 26, 1992

Aptus
Environmental Services
P.O. Box 1328
Coffeyville, KS 67337
(316) 251-6380
FAX (316) 251-7498
Sales FAX (316) 251-1095
Incinerator FAX (316) 251-0085

CERTIFICATE OF DISPOSAL

NO. 10884

ASHLAND CHEMICALS
MALEIC PLANT
BIG SANDY RIVER ROAD
NEAL, WV 25530-

- A. THIS IS TO CERTIFY THAT THE HAZARDOUS SUBSTANCE MANIFESTED TO **APTUS** ON APTUS DOCUMENT #BF02A WAS DISPOSED OF IN ACCORDANCE WITH 40 CFR 761 (AND 40 CFR 264 IF APPLICABLE) AS OF 03/20/92. ATTACHED, IS A DETAIL REPORT WHICH IDENTIFIES THE DATE(S) OF DISPOSAL AND THE PROCESS UTILIZED FOR EACH WASTE LISTED.
- B. UNDER CIVIL AND CRIMINAL PENALTIES OF LAW FOR THE MAKING OR SUBMISSION OF FALSE OR FRAUDULENT STATEMENTS OR REPRESENTATIONS (18 U.S. C. 1001 AND 15 U.S. C. 2615), I CERTIFY THAT THE INFORMATION CONTAINED IN OR ACCOMPANYING THIS DOCUMENT IS TRUE, ACCURATE AND COMPLETE. AS TO THE IDENTIFIED SECTIONS(S) (A.) OF THIS DOCUMENT FOR WHICH I CANNOT PERSONALLY VERIFY TRUTH AND ACCURACY, I CERTIFY AS THE COMPANY OFFICIAL HAVING SUPERVISORY RESPONSIBILITY FOR THE PERSONS WHO, ACTING UNDER MY DIRECT INSTRUCTIONS, MADE THE VERIFICATION THAT THIS INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

APTUS

EPA ID # KSD981506025

Brian A. Brosnan
BRIAN BROSINAN
MANAGER, ENVIRONMENTAL AFFAIRS

Aptus

DETAIL REPORT

PAGE NO. 1

RATOR
HLAND CHEMICALS
IC PLANT
SANDY RIVER ROAD

WW 25530-

WWD080645831
E: 6063276593
E CALVERT
E 0002835

CORRESPONDENT
ASHLAND CHEMICAL / NEAL PLANT
P. O. Box 391

Ashland KY 41114

PHONE: 6063276593
STEVE CALVERT
COODE: 0009398

WORKORDER # 80599
APT DOC # BF02A
CUST MANIFEST:

STATE MANIFEST:

DATE OF REPORT: 03/26/92
SALESMAN:
HOLD BACK: 0%

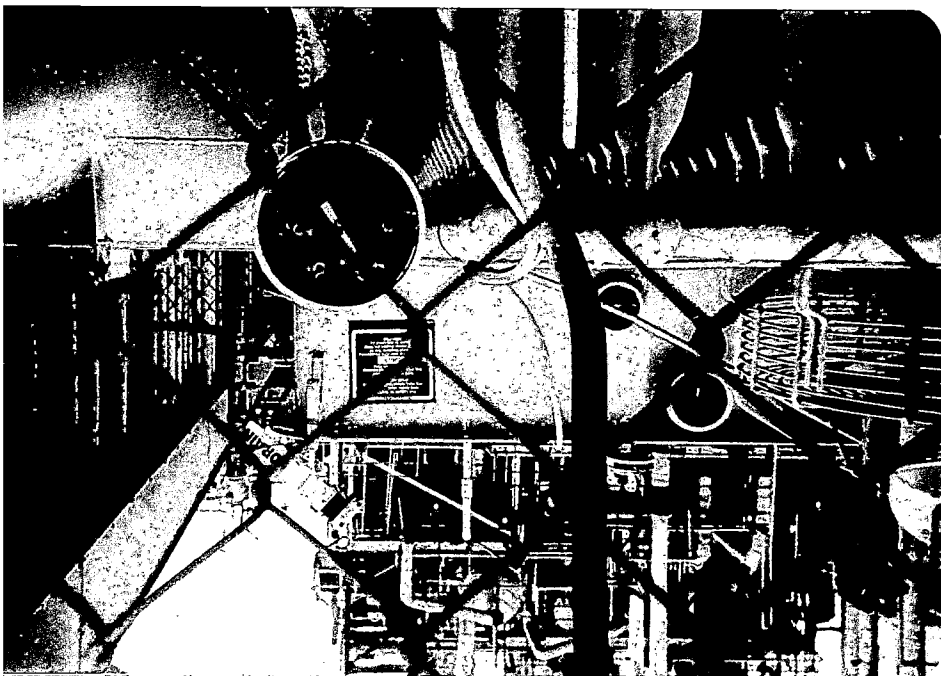
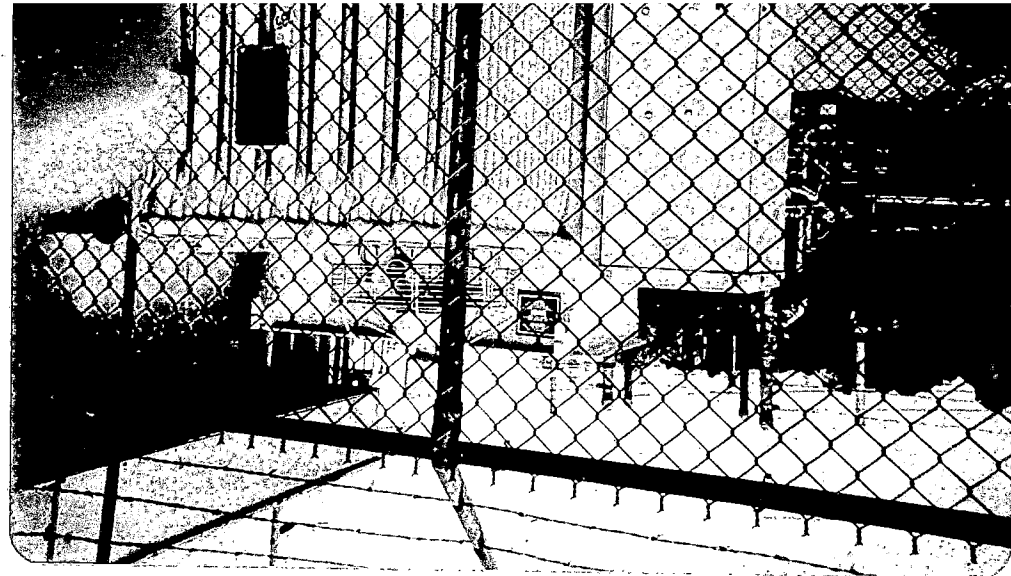
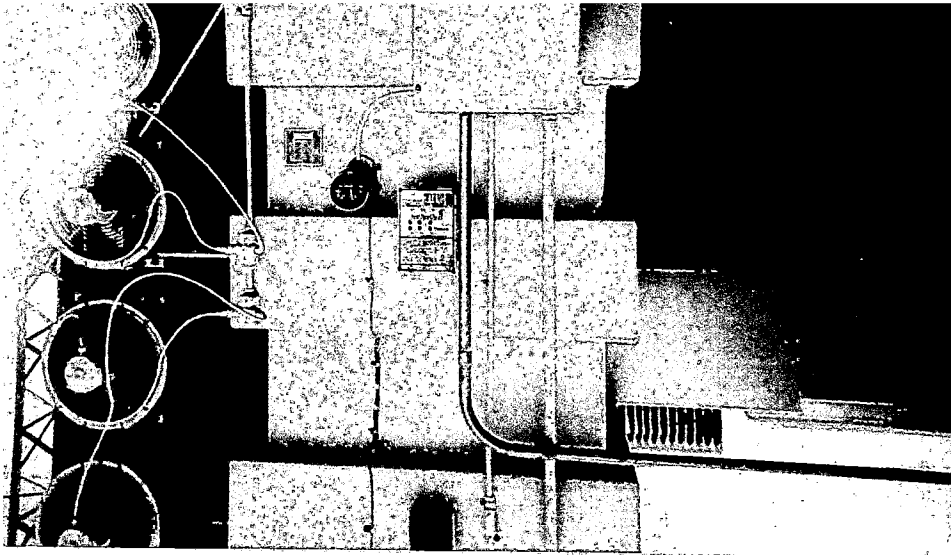
PRDTYPE	CNT	DESCRIPTION	SERIAL/DRUM #	CONCEN	UNT	WT	QTY	UNT	LOCATN	DISPOSAL FACILITY	SHIPMAN	CONUMBER	ACCEPTED	OUT/SRVC	SHIP	DESTROYD	COSENT
CAPS	1		1 of 1/18F	106	106.00				4025000	APTUS INCINERATOR COFFEYVILLE,KS	CDQ17	10884	06/11/91	04/19/91	03/17/92	03/20/92	03/26/92

ESTS ON JOB NUMBER 80599
A

C-110 CAPACITOR



Attachment 7



Ashland Chemical, Neal, WV

9/28/99

Non-PCB (green label) oil filled
transformer

Ashland Chemical, Neal, WV

Non-PCB (green label) oil filled
transformer

Ashland Chemical, Neal, WV

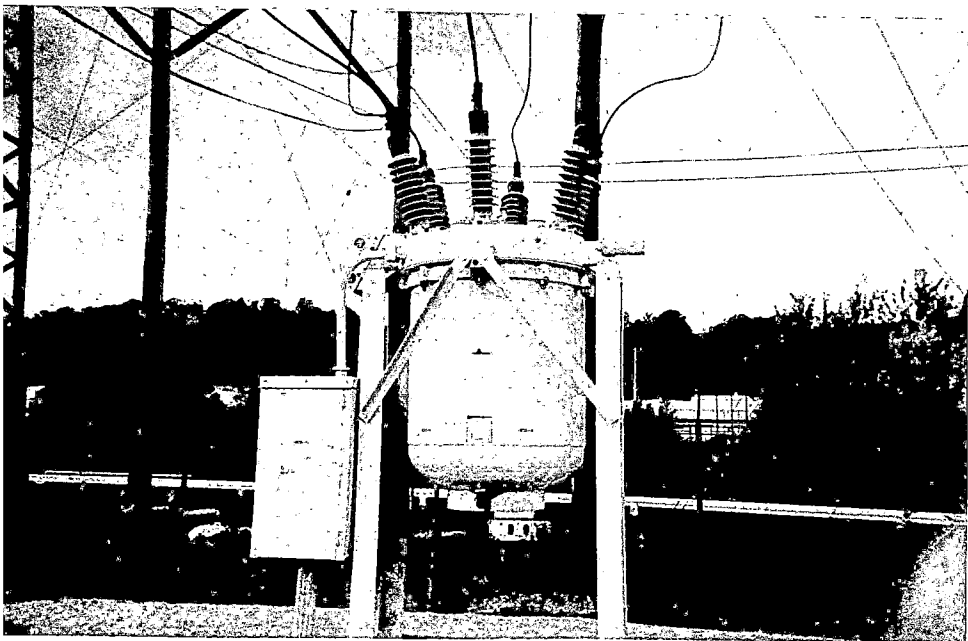
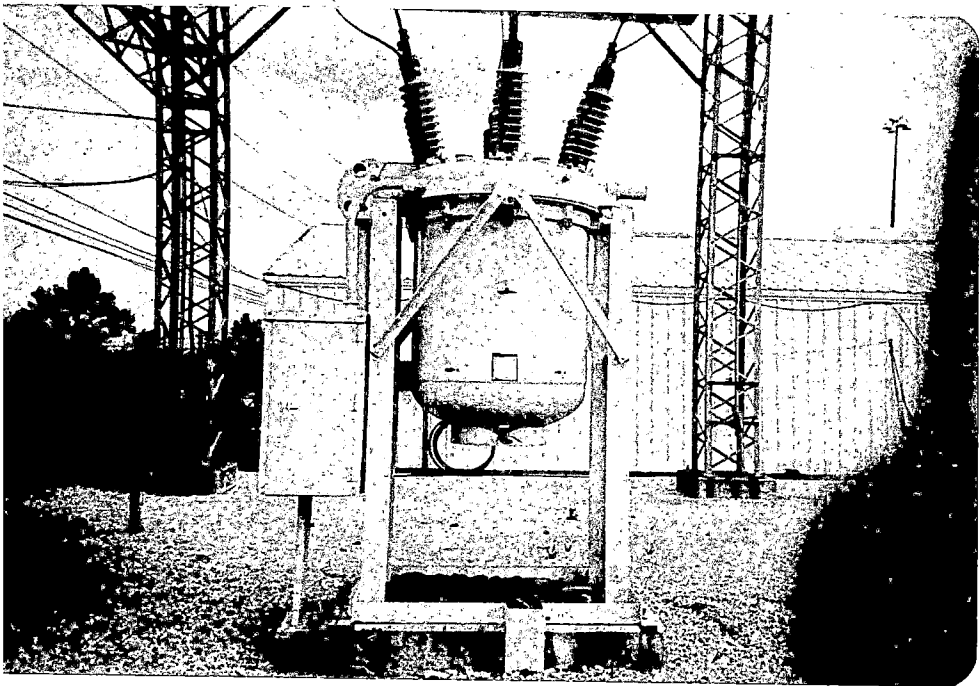
9/28/99

Non-PCB oil filled transformer

Ashland Chemical, Neal, WV

9/28/99

Non-PCB (green label) oil filled
transformer



Ashland Chemical, Neal, WV
9/28/99

Oil circuit breaker
Non-PCB

Ashland Chemical, Neal, W.
9/28/99

Oil Circuit breaker
Non-PCB